



CDSS

WILL LIGHTBOURNE  
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

June 22, 2016

Dena Murphy, Interim Director  
Kern County Department of Human Services  
100 E. California Ave.  
P.O. Box 511  
Bakersfield, CA 93307

Dear Ms. Murphy:

This letter is to advise you that the Corrective Action Plan you submitted on April 8, 2016 in response to the results of our June 15-19, 2015 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Elsa Vazquez (consultant) at (916) 654-2110. You may also contact your consultant by e-mail at [Elsa.Vazquez@edss.ca.gov](mailto:Elsa.Vazquez@edss.ca.gov).

Sincerely,

*Original signed by Jim Tashima*

JIM TASHIMA, Chief  
Civil Rights Unit  
Welfare to Work Division

c: Dianne L. Rosso, Civil Rights Coordinator

Kim McCoy Wade, Chief  
CalFresh Policy Bureau

Carlos Ocampo, Chief  
Field Operations Bureau

Tami Gutierrez, Chief  
CalFresh Management Operations Section

Paul Gardes  
CalFresh Policy Bureau

Jacqueline Hom  
State Refugee Coordinator

Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Andrew Riesenber  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty



Dena Murphy  
Director

April 8, 2016

Jim Tashima, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division  
744 P Street  
Sacramento, CA 95814

RE: Compliance Review June 15 – 19, 2015- Corrective Action Plan

Dear Mr. Tashima:

Enclosed is the Kern County Department of Human Services (DHS) final update on the Department corrective actions for the findings identified in the California Department of Social Services (CDSS) Civil Rights Bureau's report, dated February 19, 2016. The CDSS review of DHS was conducted on June 15 – 19, 2016, and resulted in several findings.

As described in the enclosure, DHS has implemented corrective action for all deficiencies (beginning with Section III B) listed in the findings.

Also included is a copy of the Kern County Civil Rights Compliance Plan with the following augmentations:

- Assignment of Resources: Civil Rights Coordinator address contact information
- Dissemination of Information: How is outreach information disseminated?

If you have any questions, please let me know or your staff may contact Dianne Rosso, Civil Rights Coordinator at (661) 631-6354 or [rossod@kerndhs.com](mailto:rossod@kerndhs.com).

Sincerely,

*Original signed by Dena Murphy*

Dena Murphy  
Director

Enclosure  
Cc: Dianne Rosso, Civil Rights Coordinator



KERN COUNTY

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Department Of Human Services

CIVIL RIGHTS  
CORRECTIVE ACTION PLAN FOR COMPLIANCE  
REVIEW  
June 15 – 19 2015

KERN COUNTY DEPARTMENT OF HUMAN SERVICES  
PO BOX 511  
BAKERSFIELD, CA 93302

### III DISSEMINATION OF INFORMATION

#### B. Corrective Actions

Informational	Corrective Action Required	Agency Response
Translated Pub 13	KCDHS shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2	KCDHS will make available a poster about the availability of the Pub 13 in all languages to be displayed in all waiting/reception areas by 5-16-16.
Directional signage	KCDHS shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24	CORRECTED: March 2016. KCDHS will make sure all instructional and directional signs posted in waiting areas are translated into the county's threshold language of Spanish.

#### C. Recommendation

1. The Pub 13, Pub 86, and Form AD 475B have been verified as the latest versions (listed below) in all waiting and reception areas.

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

#### IV FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

##### A. Findings and Corrective Actions

1. Facility Location: O C SILLS – Children’s Social Service Entrance, 100 E. California, Bakersfield CA

Facility	Findings	Corrective Action	Agency Response
Parking spaces located nearest the Children Social Service Office.	<p>Accessible Van Space is too short in width at 9’.</p> <p>Access aisle does not adjoin to an accessible route to main entrance.</p> <p>Accessible parking is not located as close as possible to entrance. Signage on pavement is faded and does not clearly depict wheelchair occupant, needs to be repainted.</p> <p>The words “NO PARKING” in access aisles on pavement are faded and are also too short in height, measuring at</p>	<p>Van Parking Space Min. Dimensions: 12’ wide by 18’ long. (CA T24 11B-502.2) (ADA 502.2) pg.176</p> <p>The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 176</p> <p>Parking spaces complying with the requirements of this section that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance complying with “Entrances” heading in Section 5, Accessible Routes - Scoping Requirements. (CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p> <p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36” wide x 36” high. (CA T24 11B-502.6.4.1) pg. 169</p> <p>The words “NO PARKING” shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in white letters a min. of 12” in height and located to be visible</p>	<p>CORRECTED: The PM corrected all referenced parking deficiencies in April 2016.</p>

	8" in.	from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176	
Entrance signage near Children Social Service Office	There is no International Symbol of Accessibility (ISA) signage at main entrance of building.	<p>Doorways and Gates shall be identified by the International <u>Symbol of Accessibility</u> complying with "International Symbol of Accessibility" heading in Section 57, Signs &amp; Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28</p> <p>Pictograms and their field shall have a non-glare finish. (CA T24 11B-703.6.2) (ADA 703.6.2) pg. 376</p> <p>Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) pg. 376</p>	CORRECTED: The International Symbol of Accessibility signage at the main entrance of the Children Social Services Office was installed in March 2016.
	5-second closure	Door closers and gate closers shall be adjusted so that from an open position of 90° degrees, the time required to move the door to a position of 12° from the latch is 5 seconds min. (CA T24 11B-404.2.8.1) (ADA 404.2.8.1) pg. 224	CORRECTED: The door closer hardware was adjusted to meet specified requirements in April 2016.

Main Entrance door pressure	Door pressure is excessive at 8 lbs.	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</li> </ol>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgmt will monitor every 60 days for compliance.</p>
Men's Restroom	Accessible Toilet is too low at 15 ½" in.	<p>The seat height of a water closet above the finish floor shall be <b>17"</b> min. and <b>19"</b> max. measured to the top of the seat. (CA T24 11B-604.4) (ADA 604.4) pg. 342</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p>
Women's Restroom	Pipes under sink are not securely insulated.	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330</p>	<p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgmt will monitor every 60 days for compliance.</p>

## 2. Facility Location: OCSILLS Main Entrance, 100 E. California, Bakersfield CA

Facility	Findings	Corrective Action	Agency Response
Parking	<p>There is no van-accessible space near main entrance.</p> <p>Accessible spaces measured too short at 17'1" L on one side, and 16'4" L on the opposite side.</p> <p>Access aisle is too narrow at 4' wide.</p> <p>Signage on pavement does not clearly depict wheelchair occupant, this needs to be repainted.</p> <p>The words "NO PARKING" in access</p>	<p>For every 6 or fraction of 6 parking spaces at least 1 shall be a van parking space. (CA T24 11B-208.2.4) (ADA 208.2.4) pg. 176</p> <p>Car parking spaces shall be 9' wide min. and van parking spaces shall be 12' wide min., shall be marked to define the width, and shall have an adjacent access aisle complying with the "Access Aisle" heading in this section. Car and van parking spaces shall be 18' long min. (CA T24 11B-502.2) (ADA 502.2)</p> <p><i>Exception</i> Van parking spaces shall be permitted to be 9' wide min. where the access aisle is 8' wide min. (CA T24 11-B502.2 (EXC.)) (ADA 502.2 (Exc.)) Access aisles serving car and van parking spaces shall be 5" wide min. (CA T24 11B-502.3.1) (ADA 502.3.1) Access aisle min. dimensions: 5' wide by 18' long. Fig. 12 (CA T24 11B-502.2) (ADA 4.6.3) pg. 176</p> <p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high. (CA T24 11B-502.6.4.1) pg. 169</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176 This notice shall be painted in white letters a min. of 12" in</p>	<p>CORRECTED: The PM corrected all referenced parking deficiencies in April 2016.</p> <p>CORRECTED: The PM corrected all referenced parking deficiencies in April 2016.</p>

	<p>aisles on pavement are too small at 8" and faded. They need to be resized and repainted.</p> <p>Access aisle does not adjoin to an accessible route to the main entrance.</p>	<p>height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3)</p> <p>The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 176</p>	
Exterior entrance	<p>Outside drop box slot reach is too high at 52".</p>	<p>Where a forward reach is unobstructed, the high forward reach shall be 48" max. and the low forward reach shall be 15" min. above the finish floor or ground. (CA T24 11B-308.2.1) (ADA 308.2.1) pg. 271</p>	<p>CORRECTED: The outside drop box slot was corrected to 48" level in March 2016.</p>
Client lobby	<p>At immediate entrance there is a slot container where forms/applications are available for clients. The instructional signage for this slot container is in English and not translated in the threshold language (Spanish). Instructional signage needs to be translated.</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21- 107.212))</p>	<p>CORRECTED: The containers on the east and west entrance walls were removed March 2016.</p> <p>Applications/forms are available at the main reception area and clearly labeled in English and Spanish.</p>

Telephone	Public Telephone coin slot reach is too high at 52".	Where a forward reach is unobstructed, the high forward reach shall be 48" max. and the low forward reach shall be 15" min. above the finish floor or ground. (CA T24 11B-308.2.1) (ADA 308.2.1) pg. 271	Facilities Management has contacted AT&T regarding removal of pay telephone in April 2016 and pending response. Facilities Mgmt will monitor every 60 days for compliance.
Women's Restroom	<p>Door pressure is excessive at 10 lbs.</p> <p>Accessible toilet seat is too low at 15 ½" in.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> </ol> <p>Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</p> <p>The seat height of a water closet above the finish floor shall be <b>17"</b> min. and <b>19"</b> max. measured to the top of the seat. (CA T24 11B-604.4) (ADA 604.4) pg. 342</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16 for all items listed.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgmt will monitor every 60 days for compliance.</p>

## 3. Facility Location: Mojave Office – 2300 Hwy 58, Mojave, CA

Facility	Findings	Corrective Action	Agency Response
Parking	There is no "Unauthorized" signage at entrance to off-street accessible parking.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg. 170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____ Or by telephoning _____)." (CA T24 11B-502.8.2) pg 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management (PM) on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>The PM has responded as of 4-5-16 and Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>

	<p>There is no additional signage or additional language below the symbol of accessibility stating "Minimum Fine \$250"</p> <p>Signage on pavement does not clearly depict wheelchair occupant, needs to be repainted.</p> <p>Access aisle does not connect to path of travel.</p> <p>Traffic aisles should be 36" wide</p> <p>Ramp protrudes into the access aisle.</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2) pg. 169</p> <p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high. (CA T24 11B-502.6.4.1) pg. 169</p> <p>The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg 176</p> <p>The clear width for aisles shall be 36" min. if serving elements on only one side. (CA T24 11B-403.5.1 (EXC.4)) pg. 207</p> <p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>The PM has responded as of 4-5-16 and Facilities Mgt will continue to monitor until all items are in compliance.</p> <p>See above</p>
Main entrance	<p>Door pressure is excessive at 7 lbs.</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> </ol>	

	Bottom of door does not have 10" smooth surface.	<p>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</p> <p>Swinging door and gate surfaces within 10" of the finish floor or ground measured vertically shall have a smooth surface on the push side extending the full width of the door or gate. (CA T24 11B-404.2.10) ADA 404.2.10) pg. 226</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>The PM has responded as of 4-5-16 and Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>
Men's Restroom	<p>Door pressure is excessive at 13 lbs.</p> <p>Towel dispenser is too high at 44 1/2".</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</li> </ol> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg. 319</p> <p>All operable parts, including coin slots, shall be 40" max.</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>The PM has responded as of 4-5-16 and Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>

Women's Restroom	<p>Door pressure is excessive at 12 lbs.</p> <p>Towel dispenser is too high at 46".</p> <p>Also, soap dispenser is too high at 42".</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</li> </ol> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg 319</p> <p>All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg 319</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>The PM has responded as of 4-5-16 and Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>
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A. Recommendation

In the Women's Restroom there were two separate towel dispensers. One of the dispensers is too high, and the second dispenser appeared it was not being used. It is this reviewer's recommendation that the dispenser not in use be reconsidered, because it does not meet the ADA measurement requirement.

1. Property Management will let our Department know when all items listed above (including the recommendation referenced above) are complete.



Men's Restroom	<p>Door pressure is excessive at 10 lbs.</p> <p>Towel dispenser is too high at 43".</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</li> </ol> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg. 319</p> <p>All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg. 319</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p> <p>See above</p>
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Women's Restroom	<p>Door pressure is excessive at 10 lbs.</p> <p>Towel dispenser is too high at 43".</p> <p>Soap dispenser is too high at 41"</p>	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> <li>1. Interior hinged doors and gates: 5 lbs. max.</li> <li>2. Sliding or folding doors: 5 lbs. max.</li> <li>3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs.</li> </ol> <p>Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 &amp; 2)) pg. 224</p> <p>Where towel or sanitary napkin dispensers, waste receptacles, or other accessories are provided in toilet facilities, at least one of each type shall be located on an accessible route. (CA T24 11B-603.5) pg. 319</p> <p>All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg. 319</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p> <p>See above</p>
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A. Recommendation

In the main lobby; there is a lower counter which meets the ADA requirement for an accessible counter. It is recommended by the reviewer that an accessible signage be placed at this counter.

1. Accessible signage was placed at this counter in March 2016.

## 6. Facility Location: Ridgecrest 1415 Ridgecrest Blvd, Ridgecrest, CA

Facility	Findings	Corrective Action	Agency Response
Parking	<p>Signage on pavement does not clearly depict wheelchair occupant, needs to be repainted.</p> <p>The words "No Parking" measured at 8" and are too short. Needs to be repainted to correct measurement.</p>	<p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high. (CA T24 11B-502.6.4.1) pg. 169</p> <p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3)</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>
Restroom	<p>Mirror located above lavatory/countertop bottom edge of reflecting surface is too high at 45".</p>	<p>Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40" max. above the finish floor or ground. Fig. 8 (CA T24 11B- 603.3) (ADA 603.3) pg. 319</p>	<p>Corrective Action Plan: Request for corrections was sent to Property Management on 3-7-16.</p> <p>A second reminder was sent on 4-1-16.</p> <p>Facilities Mgt will continue to monitor every 60 days until all items are in compliance.</p>

## **VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

### B. Corrective Actions

<b>Areas of Action</b>	<b>Corrective Action</b>	<b>Agency Response</b>
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23	<p>DHS will continue to train and remind staff of its policy to provide bilingual/interpretive services and to document a client's preferred language for oral and written communication at any point in contact, and ensuring that every case record identifies the ethnic origin and primary language.</p> <p>In addition, staff is required to document: acceptance or refusal of written material in his/her language; how bilingual services were provided, and if client brings their own interpreter – the release of information that must be signed.</p> <p>Supplemental training has been scheduled from April through May 2016 for staff including the Special Investigations Unit staff.</p>
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24	
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21	
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22	
General	KCDHS must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116	

## VIII. DISCRIMINATION COMPLAINT PROCEDURES

### B. Corrective Action

Element	Corrective Action	Agency Response
Discrimination Process	KCDHS shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203	The Civil Rights Coordinator will include in the 2016-2017 Civil Rights/Diversity Training (scheduled to begin in July 2016) a concentrated focus on how to differentiate discrimination complaints from customer service and program complaints.

## X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentations to your plan:

- a. Assignment of Resources: Civil Rights Coordinator address contact information needs to be corrected.
- b. Dissemination of Information: How is outreach information disseminated? Provide details, dates, location and methods other than mailings.

The revised Compliance Plan is attached.